

Office of Attorney General
Responses to Justice Systems Appropriations Subcommittee
February 25, 2019

At its meeting on February 7, 2019, members of the Justice Systems Appropriations Subcommittee posed several questions to Attorney General Tom Miller:

1. What accounts for the rise in the number of consumer complaints filed in 2018?

It is difficult to fully explain the increase in written consumer complaints received by the Office of Attorney General ("Office"). One reason may be the Office's attempt to augment its outreach and education by having a mobile office in all portions of the state. In addition, members of the Office's Consumer Protection Division travelled around the state, giving 33 presentations to over 7,200 Iowans. From Sioux City to Algona to Glenwood to Dubuque to Iowa City to Creston.

The Office has seen sizable increases in several categories of complaints: Imposter scam complaints have increased from 161 to 339, making them the number two complaint category. Auto repair complaints went up nearly 48% and home improvement complaints rose 25%.

The Ombudsman's Office has also experienced an up-tick in complaints.

2. What efficiencies have been achieved in the Office?

Notwithstanding fiscal constraints, the Office has achieved several efficiencies through technology.

The Office has an extensive contract with Thompson/Reuters (West) for on-line legal research. The Office has upgraded to Office 365, with email cloud storage. The Office has a robust case management software, ProLaw. With the closure of the state records center, all pleadings, briefs, and related documents are electronically stored with a matter in ProLaw.

With respect to civil litigation, the Office has contracted with Everlaw for document storage, review, and e-discovery. With respect to criminal litigation, the Office is working with the Iowa County Attorneys' Case Management Project for the exchange of criminal case information and importation into ProLaw.

3. Can you provide more details about the caseload of the Area Prosecution Division?

In Iowa, county attorneys have original jurisdiction for the prosecution of most all crimes. However, when there is a conflict-of-interest or lack of resources/experience, county attorneys may refer serious criminal cases to the Office to assist in the prosecution. The Office's Area Prosecutions Division ("Division") has 7 experienced prosecutors who handle some of the most difficult criminal cases in the state. An additional prosecutor is assigned to prosecute the Sexually Violent Predator commitment caseload. Here are some statistics for calendar year 2018:

- Division had pending cases in 67 counties.

- Opened 106 cases – 85 filed cases and 21 investigations. These numbers only reflect new cases referred to the office in calendar year 2018. There are a number of cases that are referred that remain pending for more than a year or are carried over from one year to the next.
- Of the cases opened in 2018, 28 defendants were charged with Murder 1 or Murder 2.
- Of the cases opened in 2018, 23 had an element of sexual abuse.
- Rest of the cases were Robbery 1, Robbery 2, Attempted Murder, Vehicular Homicide, Child Endangerment, Theft 1, Willful Injury, Kidnapping 1, Kidnapping 2, and Burglary 1.
- Division tried 32 cases to verdict in 27 counties. All but 3 of those cases resulted in guilty verdicts. On average, each area prosecutor will try between 4 and 6 trials to verdict each calendar year.
- The average pending caseload of an area prosecutor is 15 cases. There have been occasions when a single area prosecutor has carried over 15 cases on a docket. In several instances, there are cases with multiple defendants that may require a separate trial for each defendant. There is no way to predict when a caseload may fluctuate up or down.
- Most cases are not “garden variety” or routine. The fact that they are not routine is usually a prerequisite for the case being referred to the Division. The nature of the cases referred do not typically lend themselves to plea agreements, although some cases are resolved by plea.
- Most cases that go to trial require hundreds of hours of work that includes, but is not limited, to (1) meetings with state and local law enforcement to ensure a proper investigation; (2) meetings with victims and the family of victims to provide them updated information about a pending case and to prepare them for trial; (3) review of hundreds or sometimes thousands of documents and videos in a particular case; (4) preparation for depositions and trial that includes significant time spent preparing witnesses; (5) preparation for the trial that includes significant time preparing witnesses, outlines, exhibits and (6) other matters that are necessary to competently try a complex criminal case.
- Most cases require extensive travel that many times include overnight stays. On average, each area prosecutor was required to stay 40 nights on the road. Cases are prosecuted in all four corners of the state which, even if overnight stays are not required, include significant travel time to reach the location of the case.
- Area prosecutors are required to juggle schedules that cross over multiple judicial district court administration offices which each have their own priority dates for trials, motions and other court matters. In many instances, these dates conflict and require additional effort to schedule even routine matters. All 99 county attorneys who prosecute cases locally deal with only one district court administration calendar.

The Division also handles the civil commitment of Sexually Violent Predators (“SVPs”). During fiscal year 2018, the Division prosecuted 19 original SVP commitment trials and 11 annual SVP review trials. Most of these cases were prosecuted by a single assistant attorney general in the Division. Currently, 113 SVPs are civilly committed at CCUSO in Cherokee.

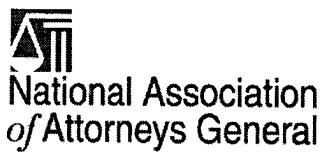
4. What can be done regarding the abuse of the Internet to facilitate human trafficking and other crimes?

Regulating illegal activity on the Internet is a difficult proposition, particularly at the state level. Nevertheless, the Office is very concerned about this issue and has acted in this arena. In 2011, Iowa

joined the National Association of Attorneys General (“NAAG”) in a demand that Backpage.com comply with its assurances that the company was not facilitating the sexual exploitation of children and prostitution. (See attached letter.) Backpage and other internet sites have since discontinued advertisements and sections that promote prostitution, human trafficking, and sexual exploitation of children.

NAAG also sent two letters to Congress, one in 2013 and one in 2017 (see attached letter), urging Congress to amend the Communication Decency Act so state and local governments could criminally investigate and prosecute online classified websites that promote prostitution and child sex trafficking. Congress enacted the change in 2018 and according to the *Washington Post* it “was hailed by anti-trafficking groups and law enforcement as an important step in fighting online prostitution of teenagers.”

As discussed at the committee meeting, the Office carries out extensive training with respect to human trafficking, in collaboration with the Department of Public Safety and the Iowa Law Enforcement Academy. The Office’s Area Prosecution Division has handled at least two human trafficking cases in cooperation with county attorneys.



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August 16, 2017

The Honorable Roger Wicker
Chairman
Senate Subcommittee on Communications,
Technology, Innovation and the Internet
Committee on Commerce, Science and
Transportation

The Honorable Brian Schatz
Ranking Member
Senate Subcommittee on Communications,
Technology, Innovation and the Internet
Committee on Commerce, Science, and
Transportation

The Honorable Marsha Blackburn
Chairman
House of Representatives Subcommittee on Communications
and Technology
Committee on Energy and Commerce

The Honorable Michael Doyle
Ranking Member
House of Representative Subcommittee on Communications and
Technology
Committee on Energy and Commerce

RE: Amendment of Communications Decency Act

Dear Chairman Wicker, Ranking Member Schatz, Chairman Blackburn, and Ranking Member Doyle:

In 2013, Attorneys General from 49 states and territories wrote to Congress, informing it that some courts have interpreted the Communications Decency Act of 1996 (“CDA”) to render state and local authorities unable to take action against companies that actively profit from the promotion and facilitation of sex trafficking and crimes against children. Unfortunately, nearly four years later, this problem persists and these criminal profiteers often continue to operate with impunity. The recent news highlighting the potential complicity of online classified-ad company Backpage.com in soliciting sex traffickers’ ads for its website once again underscores the need to expand, not limit, the ability of *all* law-enforcement agencies to fight sex

trafficking.¹ The undersigned Attorneys General once again respectfully request that the United States Congress amend the CDA to affirm that state, territorial, and local authorities retain their traditional jurisdiction to investigate and prosecute those who facilitate illicit acts and endanger our most vulnerable citizens.

As noted in the 2013 letter, certain federal courts have broadly interpreted the CDA.² One high-profile result is that some state and local law enforcement agencies have been left powerless to act against online classified ad services, such as Backpage.com, which have constructed their business models around advertising income gained from participants in the sex trade.³ Just a few examples of the countless instances of child sex trafficking — and its online promotion — that occur every day in the United States include the following:

- Police in Stockton, California recently arrested more than 20 people in a human trafficking and prostitution ring. Eight girls between the ages of 14 and 17 were being trafficked for sex using advertisements on Backpage.com.⁴
- Federal and state law enforcement recently arrested a Chicago man accused of pimping a 16-year-old girl via Backpage.com, leading to her murder. The man “shopped [the girl] around on Backpage.com,” delivered her to a customer, and then fell asleep in his car outside a parking garage. When he awoke, he discovered the girl’s body in the garage, “her throat slit and her body badly beaten.”⁵

¹ Tom Jackman and Jonathan O’Connell, *Backpage has always claimed it doesn’t control sex-related ads. New Documents show otherwise*, Washington Post, July 11, 2017, available at https://www.washingtonpost.com/local/public-safety/backpage-has-always-claimed-it-doesnt-control-sex-related-ads-new-documents-show-otherwise/2017/07/10/b3158ef6-553c-11e7-b38e-35fd8e0c288f_story.html (last visited July 12, 2017).

² See, e.g., *Senate Permanent Subcommittee v. Ferrer*, 199 F. Supp. 3d 125, 136 (D.D.C. 2016), *vacated as moot*, 856 F.3d 1080 (D.C. Cir. 2017); *Backpage.com, LLC v. McKenna*, 881 F. Supp. 2d 1262, 1275 (W.D. Wash. 2012); *M.A. v. Village Voice Media Holdings, LLC*, 809 F. Supp. 2d 1041, 1048–56 (E.D. Mo. 2011); *Dart v. Craigslist*, 665 F. Supp. 2d 961, 965 & n.6 (N.D. Ill. 2009); *Doe v. Bates*, 2006 WL 3813758, at **3–5 (E.D. Tex. Dec. 27, 2006); *see also Google, Inc. v. Hood*, 96 F. Supp. 3d 584, 596–98 (S.D. Miss. 2015), *vacated & remanded on other grounds*, 822 F.3d 212 (5th Cir. 2016).

³ While Backpage.com claims to have shut down its prostitution/escort ads after a U.S. Senate hearing in January, there are reports of the ads merely moving to different sections. *See Brian Rokos, Backpage.com Removes ‘Escort’ Ads – Or Does It?*, Press-Enterprise, Jan. 11, 2017, available at <http://www.pe.com/articles/backpage-822842-ads-subcommittee.html/> (last visited July 6, 2017); Kevin Litten, *New Orleans Backpage Prostitution Ads Now Listed as Dating Ads, Human Trafficking Experts Say*, Times-Picayne, Jan. 17, 2017, available at http://www.nola.com/politics/index.ssf/2017/01/backpage_prostitution_new_orle.html (last visited July 6, 2017); Stephen Koff, *Backpage.com Still Appears to Be Running Ads for Prostitutes, Sexual Services*, Cleveland.com, Jan. 12, 2017, available at http://www.cleveland.com/metro/index.ssf/2017/01/backpagecom_might_not_have_act.html (last visited July 6, 2017).

⁴ Sarah Heise, *23 Arrested for Human Trafficking, Prostitution in San Joaquin County*, KCRA 3, May 5, 2017, available at <http://www.kcra.com/article/23-arrested-in-san-joaquin-county-human-trafficking/9588063> (last visited June 29, 2017).

⁵ *Feds Charge Man for Prostituting 16-Year-Old Girl Before Her Murder*, ABC 7 Eyewitness News, June 21, 2017, available at <http://abc7chicago.com/news/feds-charge-man-for-prostituting-16-year-old-girl-before-her-murder/2128793/> (last visited June 29, 2017).

- Police in Georgia recently arrested three people who used Backpage.com to pimp a pregnant 17-year-old girl.⁶
- Police in Florida recently arrested a woman who used Backpage.com to prostitute a missing 16-year-old girl throughout Broward County.⁷

Clearly, in these instances, Backpage.com is facilitating — and profiting from — these illegal activities. However, certain interpretations of the CDA have resulted in companies like Backpage.com remaining outside the reach of state and local law enforcement in these kinds of cases. We do not believe that was Congress's intent in passing the CDA, and we do not believe that is Congress's intent now. It is both ironic and tragic that the CDA, which was intended to protect children from indecent material on the internet,⁸ is now used as a shield by those who profit from prostitution and crimes against children.

Federal enforcement alone has proved insufficient to stem the growth in online promotion of child sex trafficking. Those on the front lines of the battle against the sexual exploitation of children — state and local law enforcement — must have the clear authority to investigate and prosecute facilitators of these and other horrible crimes. Thus, we recommend that 47 U.S.C. § 230(e)(1) be amended to the following (added language in **bold**):

Nothing in this section shall be construed to impair the enforcement of section 223 or 231 of this title, chapter 71 (relating to obscenity) or 110 (relating to sexual exploitation of children) of title 18, or any other Federal, **State, or Territorial** criminal statute.

We are aware of efforts in Congress to preserve state criminal statutes that prohibit certain kinds of sexual exploitation and sex trafficking, and to preserve federal and state statutes that provide causes of action, restitution, or other civil remedies to victims. We ask that, in addition to these efforts, Congress consider enacting our proposed change. We believe the CDA should be clear in preserving both state and territorial law to the same extent that it preserves federal law — *i.e.*, the CDA should be clear that it preserves *all* state and territorial criminal statutes, just as it preserves *all* federal criminal statutes. The simple addition this letter proposes would do just that and will help to ensure that we are able to effectively protect citizens and

⁶ Ross Cavitt, *Trio Accused of Pimping Pregnant Teen for Sex*, WSB-TV 2, June 23, 2017, available at <http://www.wsbtv.com/news/local/cobb-county/trio-accused-of-pimping-pregnant-teen-for-sex/539101607> (last visited June 29, 2017).

⁷ Tonya Alanez, *Girl, 19, Accused of Pimping Out Missing 16-Year-Old*, Sun Sentinel, June 2, 2017, available at <http://www.sun-sentinel.com/local/broward/plantation/fl-teen-female-pimp-arrest-20170601-story.html> (last visited June 29, 2017).

⁸ 104 Cong. Rec. S2308-01 (daily ed. June 14, 1995) (statement of Sen. Coats) (“Mr. President, all you have to do is pick up the telephone and call the FBI, ask their child exploitation task force about the volume of over-the-Internet attempts to seduce, abuse, and lure children into pornography and sexual exploitation.”); 104 Cong. Rec. H8470 (daily ed. Aug. 4, 1995) (statement of Rep. Cox) (“We want to encourage people like Prodigy, like CompuServ, like America Online, like the new Microsoft network, to do everything possible for us, the customer, to help us control, at the portals of our computers, at the front door of our house, what comes in and what our children see.”).

children throughout the entire country, in all courts. We thank you for your attention to this vital matter.

Respectfully,



Karl A. Racine
District of Columbia Attorney General



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Alabama Attorney General



Mark Brnovich
Arizona Attorney General



Xavier Becerra
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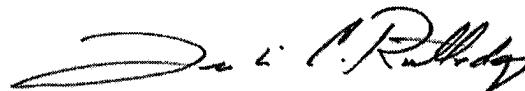
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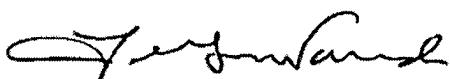
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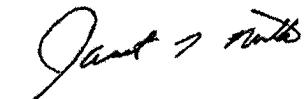
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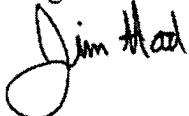
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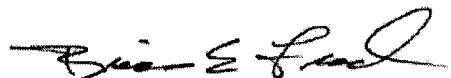
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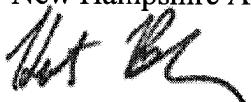
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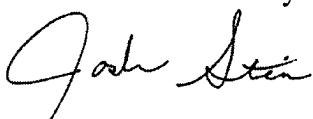
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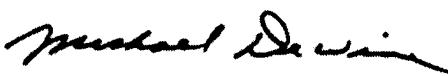
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New Hampshire Attorney General



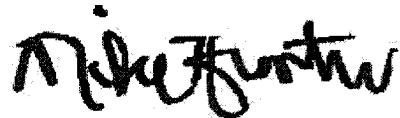
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Josh Stein
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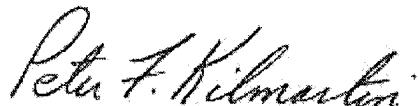
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Mike Hunter
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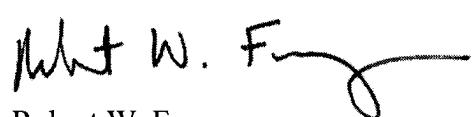
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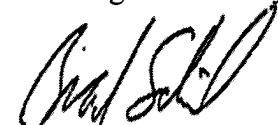
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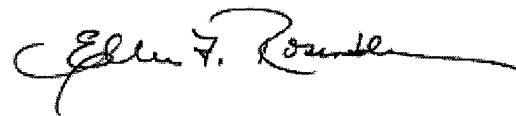
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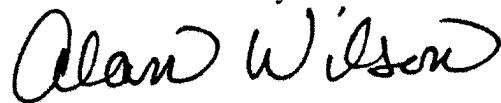
Brad Schimel
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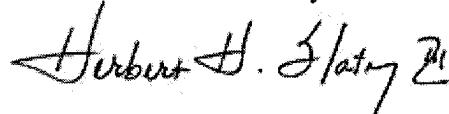
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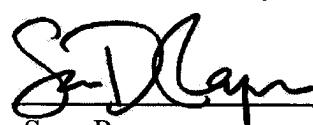
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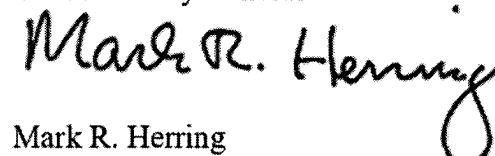
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Copy: The Honorable John Thune, Chairman, Senate Committee on Commerce, Science, and Transportation; The Honorable Bill Nelson, Ranking Member, Senate Committee on Commerce, Science, and Transportation; The Honorable Greg Walden, Chairman, House of Representatives Committee on Energy and Commerce; The Honorable Frank Pallone, Ranking Member, House of Representatives Committee on Energy and Commerce



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August 31, 2011

Mr. Samuel Fifer
Counsel for Backpage.Com, LLC
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233 South Wacker Drive
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Chicago, IL 60606-6306

**Re: Backpage.com's ongoing failure to effectively limit
prostitution and sexual trafficking activity on its website**

Mr. Fifer:

This letter is in response to Backpage.com's assurances, both public and in private, concerning the company's facilitation of the sexual exploitation of children, and prostitution. As our state's chief law enforcement officers, we are increasingly concerned about human trafficking, especially the trafficking of minors. Backpage.com is a hub for such activity.

While Backpage.com professes to have undertaken efforts to limit advertisements for prostitution on its website, particularly those soliciting sex with children, such efforts have proven ineffective. In May, for example, a Dorchester, Massachusetts man was charged for forcing a 15-year-old girl into a motel to have sex with various men for \$100 to \$150 an hour. To find customers, the man posted a photo of the girl on Backpage.com. He was later found with \$19,000 in cash. In another example, prosecutors in Washington state are handling a case in which teen girls say they were coerced, threatened and extorted by two adults who marketed them on Backpage.com.

We have tracked more than 50 instances, in 22 states over three years, of charges filed against those trafficking or attempting to traffic minors on Backpage.com. These are only the stories that made it into the news; many more instances likely exist. These cases often involve runaways ensnared by adults seeking to make money by sexually exploiting them. In some cases, minors are pictured in advertisements. In others, adults are pictured but minors are substituted at the "point of sale" in a grossly illegal transaction.

Nearly naked persons in provocative positions are pictured in nearly every adult services advertisement on Backpage.com and the site requires advertisements for escorts, and other similar "services," to include hourly rates. It does not require forensic training to understand that these advertisements are for prostitution. This hub for illegal services has proven particularly enticing for those seeking to sexually exploit minors.

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In a meeting with the Washington State Attorney General's Office, Backpage.com vice president Carl Ferrer acknowledged that the company identifies more than 400 "adult services" posts every month that may involve minors. This figure indicates the extent to which the trafficking of minors occurs on the site – the actual number of minors exploited through Backpage.com may be far greater. The company's figures, along with real world experience, demonstrate the extreme difficulty of excising a particularly egregious crime – the sexual exploitation of minors – on a site seemingly dedicated to the promotion of prostitution.

On a regional basis, there has been no change in postings for prostitution services on Backpage.com. For example, between July 28 and August 1, the Missouri Attorney General's Office on behalf of the Attorneys General Working Group conducted a review of adult content on Backpage.com. This review revealed numerous daily postings for "escort" services in the Adult>Escorts section. On Sunday, July 31, in the St. Louis-area alone, there were one hundred and three (103) new postings for such services. Other regional examples include:

- On August 1, the Washington State Attorney General's Office found one hundred and forty two (142) advertisements that are obviously for prostitutes in the Seattle area; and
- On August 2, even the Connecticut State Attorney General's Office found advertisements for prostitutes in the Connecticut area on the Springfield, Massachusetts and Rhode Island pages, circumventing Backpage.com's omission of a Connecticut adult section.

Missouri investigators further confirmed that Backpage.com's review procedures are ineffective in policing illegal activity. On July 28 and July 29, investigators flagged twenty five (25) new postings advertising prostitution in the St. Louis, Kansas City, Springfield, Columbia, and Jefferson City areas. By August 1, at least four days later, only five of these postings, or less than a quarter, had been removed.

The prominence of illegal content on Backpage.com conflicts with the company's representations about its content policies. Backpage.com claims that it "is committed to preventing those who are intent on misusing the site for illegal purposes."¹ To that end, Backpage.com represents that it has "implemented strict content policies to prevent illegal activity," and that the company has "inappropriate ad content removed."² Backpage.com also requires those who post "adult services" advertisements to click a link indicating they agree not to "post any solicitation directly or in 'coded' fashion for any illegal service exchanging sexual favors for money or other valuable consideration."³ However, a cursory look at a relevant section demonstrates that this guideline is not enforced.⁴

In fact, in a meeting with the Washington State Attorney General's Office, Village Voice Media Board Member Don Moon readily admitted that prostitution advertisements regularly appear on Backpage.com. This shows that the stated representations about the site are in direct

¹ Backpage.com, Safety and Security Enhancements, <http://blog.backpage.com/> (last visited August 05, 2011).

² *Id.*

³ See Backpage.com, Posting Rules,

<http://posting.seattle.backpage.com/gyrobase/classifieds/PostAdPPI.html/sea/posting.seattle.backpage.com/?section=4381&category=4443&u=sea&serverName=posting.seattle.backpage.com&superRegion=Seattle> (last visited August 05, 2011)..

⁴ See Backpage.com, Seattle Escorts, <http://seattle.backpage.com/FemaleEscorts/> (last visited August 05, 2011).

conflict with the reality of Backpage's business model: making money from a service illegal in every state, but for a few counties in Nevada.

Based on an independent assessment by the AIM Group, Backpage.com's estimated annual revenue from its adult services section is approximately \$22.7 million. This figure, along with information you provided to the Working Group, indicates that Backpage.com devotes only a fraction of the revenue generated from its adult section advertisements to manual content review. We believe Backpage.com sets a minimal bar for content review in an effort to temper public condemnation, while ensuring that the revenue spigot provided by prostitution advertising remains intact. Though you have stated "all new ads are moderated by a staff member,"⁵ there appear to be no changes in the volume of prostitution advertisements resulting from this "moderation."

As a practical matter, it is likely very difficult to accurately detect underage human trafficking on Backpage.com's adult services section, when to an outside observer, the website's sole purpose seems to be to advertise prostitution. That is why Craigslist's decision to shut down its adult services section was applauded as a clear way for it to eradicate advertising on its website that trafficked children for prostitution. It is also why we have called on Backpage.com to take similar action.

Furthermore, in lieu of a subpoena, the Working Group asks that Backpage.com provide additional information so that we may better understand the company's policies and practices. As noted earlier, Backpage.com represents that it has "strict content policies to prevent illegal activity."⁶ We ask that Backpage.com substantiate this claim by:

1. Describing in detail Backpage.com's understanding of what precisely constitutes "illegal activity," including whether Backpage.com contends that advertisements for prostitution services do not constitute advertisements for "illegal activity;"
2. Providing a copy of such policies, including but not limited to the specific criteria used to determine whether an advertisement may involve illegal activity;
3. Providing the list of the prohibited terms for which Backpage.com is screening;
4. Describing in detail the individualized or hand review process undertaken by Backpage.com, including the number of personnel currently assigned to conduct such review;
5. Stating the number of advertisements in its adult section, including all subsections, submitted since September 1, 2010;
6. Stating the number of advertisements, in its adult section, including all subsections, submitted since September 1, 2010, which were subjected to individualized or hand review prior to publication; and
7. Stating the number of advertisements in its adult section, including all subsections, submitted since September 1, 2010, rejected prior to publication because they involved or were suspected to involve illegal activity.

⁵ Letter from Samuel Fifer, Attorney, SNR Denton, to Attorneys General Working Group (Jan. 27, 2011).

⁶ Backpage.com, *supra* note 1.

Backpage.com's further represents that it has "inappropriate ad content removed."⁷ We ask that Backpage.com substantiate this claim by:

8. Describing the criteria used to determine whether a published advertisement should be removed due to actual or suspected illegal activity;
9. Providing a copy of such policies that detail the criteria used to determine whether a published advertisement should be removed due to actual or suspected illegal activity;
10. Describing in detail the criteria Backpage.com uses, including but not limited to the number of user reports required, before a published advertisement is subjected to further review;
11. Providing a copy of such policies that detail the criteria Backpage.com uses, including but not limited to the number of user reports required, before a published advertisement is subjected to further review;
12. Stating the number of published advertisements posted since September 1, 2010 in its adult section, including all subsections, that Backpage.com has subjected to post publication review;
13. Stating the number of published advertisements posted since September 1, 2010 in its adult section, including all subsections, that Backpage.com removed following post publication review;
14. Stating the number of published advertisements posted since September 1, 2010 in its adult section, including all subsections, that Backpage.com did not remove following post publication review;
15. Stating the number of published advertisements posted since September 1, 2010 that were not subjected to further review by Backpage.com despite the receipt of user reports.

Lastly, Backpage.com also represents that it is "partnering with law enforcement and safety advocates/experts."⁸ We request that Backpage.com support this assertion by:

16. Identifying the specific "law enforcement [agencies] and safety advocates/experts" with whom Backpage.com has partnered and describing the actions taken by Backpage.com in connection with such partnerships;
17. Stating the number of advertisements submitted since September 1, 2010 that Backpage.com has reported pre-publication to local, state or federal law enforcement agencies, or to the National Center for Missing and Exploited Children's Cyber Tipline, because of actual or suspected illegal activity;
18. Stating the number of user reports of suspected exploitation of minors and/or human trafficking Backpage.com requires before subjecting a published advertisement to further review;
19. Stating the number of published advertisements posted since September 1, 2010 that Backpage.com removed in response to such user reports;
20. Stating the number of published advertisements posted since September 1, 2010 that Backpage.com reported to local, state or federal law enforcement agencies, or to the National Center for Missing and Exploited Children's Cyber Tipline, as a result of such reports; and

⁷ Backpage.com, *supra* note 1.

⁸ Backpage.com, *supra* note 1.

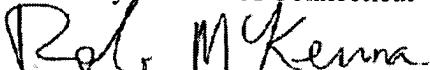
21. Stating the number of published advertisements posted since September 1, 2010 that Backpage.com did not remove following a review prompted by user reports.

The National Association of Attorneys General requests Backpage.com's response on or before September 14, 2011.

Respectfully,



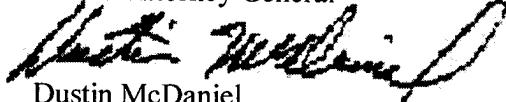
George Jepsen
Attorney General of Connecticut



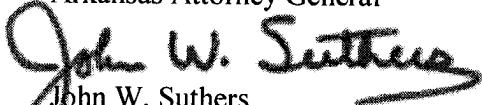
Rob McKenna
Attorney General of Washington



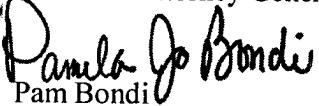
John J. Burns
Alaska Attorney General



Dustin McDaniel
Arkansas Attorney General



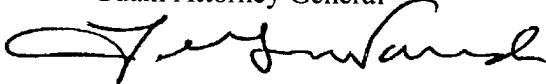
John W. Suthers
Colorado Attorney General



Pam Bondi
Florida Attorney General



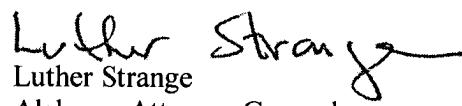
Lenny Rapadas
Guam Attorney General



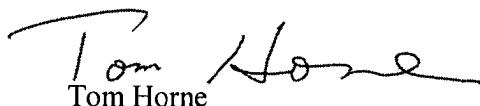
Lawrence Wasden
Idaho Attorney General



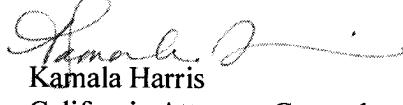
Chris Koster
Attorney General of Missouri



Luther Strange
Alabama Attorney General



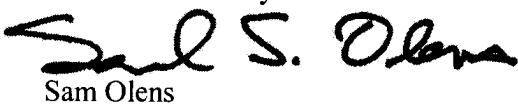
Tom Horne
Arizona Attorney General



Kamala Harris
California Attorney General



Joseph R. "Beau" Biden III
Delaware Attorney General



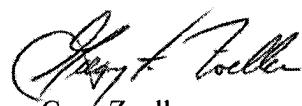
Sam Olens
Georgia Attorney General



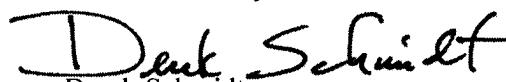
David Louie
Hawaii Attorney General



Lisa Madigan
Illinois Attorney General



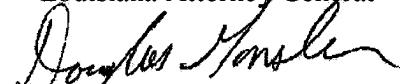
Greg Zoeller
Indiana Attorney General



Derek Schmidt
Kansas Attorney General



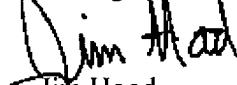
James "Buddy" Caldwell
Louisiana Attorney General



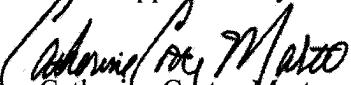
Douglas F. Gansler
Maryland Attorney General



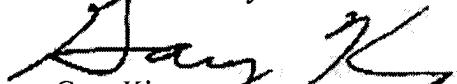
Bill Schuette
Michigan Attorney General



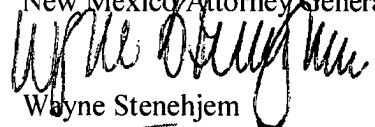
Jim Hood
Mississippi Attorney General



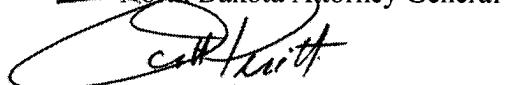
Catherine Cortez Masto
Nevada Attorney General



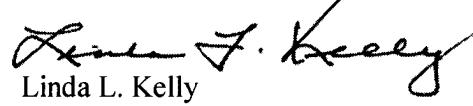
Gary King
New Mexico Attorney General



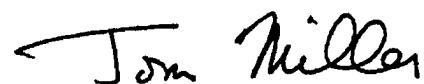
Wayne Stenehjem
North Dakota Attorney General



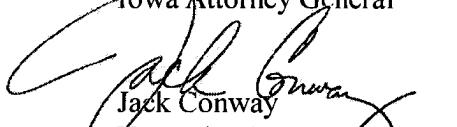
Scott Pruitt
Oklahoma Attorney General



Linda L. Kelly
Pennsylvania Attorney General



Tom Miller
Iowa Attorney General



Jack Conway
Kentucky Attorney General



William J. Schneider
Maine Attorney General



Martha Coakley
Massachusetts Attorney General



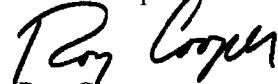
Lori Swanson
Minnesota Attorney General



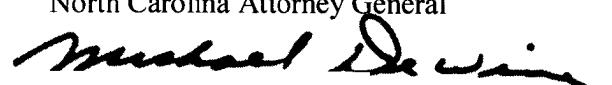
Steve Bullock
Montana Attorney General



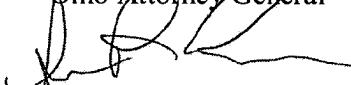
Michael Delaney
New Hampshire Attorney General



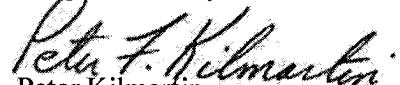
Roy Cooper
North Carolina Attorney General



Mike Dewine
Ohio Attorney General



John Kroger
Oregon Attorney General



Peter Kilmartin
Rhode Island Attorney General

Alan Wilson

Alan Wilson
South Carolina Attorney General

R.E. Cooper, Jr.

Robert E. Cooper, Jr.
Tennessee Attorney General

Mark Shurtleff

Mark Shurtleff
Utah Attorney General

Greg Phillips

Greg Phillips
Wyoming Attorney General

Marty J. Jackley

Marty J. Jackley
South Dakota Attorney General

Greg Abbott

Greg Abbott
Texas Attorney General

Ken Cuccinelli

Ken Cuccinelli
Virginia Attorney General